ESTTA Tracking number:

ESTTA660744 03/12/2015

Filing date:

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92059301
Party	Plaintiff Grange Insurance Association
Correspondence Address	JOHN CROSETTO GARVEY SCHUBERT & BARER 1191 SECOND AVE, STE 1800 SEATTLE, WA 98101 UNITED STATES trademarks@gsblaw.com, jcrosetto@gsblaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Leanne Andrepont
Filer's e-mail	trademarks@gsblaw.com
Signature	/Leanne M. Andrepont/
Date	03/12/2015
Attachments	granger - motion to extend.pdf(106437 bytes)

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Registration Nos. 3,821,201 and 3,723,315

For the mark: GRANGE INSURANCE and GRANGE INSURANCE and Design

Grange Insurance Association,

Petitioner,

Cancellation No. 92059301

VS.

Grange Mutual Casualty Company,

Respondent.

## CONSENTED MOTION TO EXTEND DEADLINES

Pursuant to section 509 of the Trademark Trial and Appeal Board Manual of Procedure, Petitioner requests that all dates in the above-captioned proceeding be extended for twenty (20) days in order to permit both parties to complete discovery in this complex case. Petitioner and Registrant mutually consent to this motion.

Petitioner and Registrant therefore request that the Board reset the dates as set forth below.

Expert Disclosures Due	April 1, 2015	
Discovery Closes	May 1, 2015	
Plaintiff's Pretrial Disclosures	June 15, 2015	
Plaintiff's 30-day Trial Period Ends	July 30, 2015	
Defendant's Pretrial Disclosures	August 14, 2015	

Defendant's 30-day Trial Period Ends	September 28, 2015
Plaintiff's Rebuttal Disclosures Due	October 13, 2015
Plaintiff's 15-day Rebuttal Period Ends	November 12, 2015

Respectfully submitted,

GARVEY, SCHUBERT & BARER

Attorneys for Petitioner 1191 Second Avenue, Suite 1800 Seattle, Washington 98101 (206) 464-3939 trademarks@gsblaw.com

John Crosetto

Dated: March 12, 2015 Ref: 09208-65000

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Consented Motion to Extend Deadlines was served on March 12, 2015, by email, on:

Laura T. Geyer Vorys, Sater, Seymour and Pease LLP 1909 K Street, NW, 9<sup>th</sup> Floor Washington, DC 20006 ltgeyer@vorys.com

John Crosetto

GSB:5030569.1 [99991.62091]